

Phase I, WW Phase II, and EWA PH II Formal Draft Comments				
Name	Document	Section	Page	Comment
Shoreline	WWA Phase II	General		The City noted inconsistent capitalization for the word "Permittees"
Shoreline	WWA Phase II	General		The City noted inconsistent comma usage.
Shoreline	WWA Phase II	Comprehensive Stomwater Planning (WWA)	16	S5.C.1 - Typo in 3rd sentence. "...shall implement a Comprehensive Stormwater Planning program to inform and assist in the development of policies and strategies as a water quality management tool to protect aquatic resources."
Shoreline	WWA Phase II	Comprehensive Stomwater Planning (WWA)	17	S5.C.1.b.ii - The first sentence of the first paragraph references New Permittees. The second sentence of the first paragraph just references Permittees. Is the second sentence supposed to just reference New Permittees? Or is it a requirement for All Permittees? Clarify by adding "New" or "All" as appropriate.
Shoreline	WWA Phase II	Comprehensive Stomwater Planning (WWA)	18	S5.C.1.c.i - Reference the "Stormwater Action Planning Guidance" in this section, or move this section to S5.C.1.b after the reference to the guidance document in S5.C.1, and before the Low Impact Development code related requirements.
Shoreline	WWA Phase II	Education and Outreach	20	S5.C.2.a - Can the same campaign/program element that focuses on the same BMP/audience be used to meet general awareness, behavior change and Stewardship opportunities, or do we need to select unique BMP/audience combinations for each of those sections? If not, the City requests that Ecology include language to clarify that a different audience and/or BMP needs to be selected for each campaign/program element.
Shoreline	WWA Phase II	Education and Outreach	21	S5.C.2.a.ii(b) - What does Ecology mean by "ongoing behavior change program"? Is the intention that we continue with the particular behavior change program/element/campaign we evaluated under the 2013-2018 permit? If so, the language should clarify this. Or can this be an evaluation of a different BMP/behavior change program/element/campaign? If so, it would be a new baseline evaluation and the language should be clarified to include that.
Shoreline	WWA Phase II	Education and Outreach	22	S5.C.2.a.ii(f) - Same comment/question as S5.C.2.a.ii(b), does this mean we need to continue the same BMP behavior change program/element/campaign, or just that we need to continue a behavior change component?
Shoreline	WWA Phase II	Education and Outreach	22	S5.C.2.a.iii - Does the permittee need to provide any of these opportunities itself, or can it advertise and support opportunities provided locally by other organizations? The word "create" is confusing here, as it implies the permittee would need to create the opportunities themselves. We would suggest reconsidering this word and possibly using "implement" or similar instead.
Shoreline	WWA Phase II	Mapping and Documentation (WWA)	24	S5.C.4.b.i - The language should be clearer. What does "beginning on January 1, 2020" mean? Does that mean permittees need to start collecting size and material for "known" outfalls? If so, is there a timeline for completion? What does "where known" mean?
Shoreline	WWA Phase II	IDDE	26	S5.C.5.c.v - 2nd comma in first line should be moved, should read "Permittees shall continue to evaluate, and if necessary, update existing ordinances..."

				<p>S5.C.5.d.i - Each paragraph within should be its own section, especially since each has a report question associated with it, i.e.:</p> <p>i. Procedures for conducting investigations...</p> <p>ii. The Permittee shall implement a field screening....</p> <p>iii. All Permittees shall complete field screening...</p> <p>And the subsequent sections should be renumbered (current S5.C.5.d.ii becomes S5.C.5.d.iv and current S5.C.5.d.iii becomes S5.C.5.d.v).</p> <p>Additionally, in the second paragraph that begins with "The Permittee shall implement a field screening....", there's a comma that should be a period after Inc in Herrera Environmental Consultants, Inc"</p>
Shoreline	WWA Phase II	IDDE	26	
Shoreline	WWA Phase II	IDDE	28	S5.C.5.g - Need an example IDDE scenario and an example xml file that uses the example IDDE scenario.
Shoreline	WWA Phase II	Operations and Maintenance	32	S5.C.7.b.i - Does this apply to all stormwater treatment and flow control BMPs/facilities permitted, even if they don't discharge to the MS4? Or just ones that discharge to the MS4?
Shoreline	WWA Phase II	Operations and Maintenance	33	S5.C.7.b.i(c) - This should be moved to S5.C.6.c since this is an inspection requirement during the construction phase, not post-construction.
Shoreline	WWA Phase II	Operations and Maintenance	33	S5.C.7.b.ii - What does it mean by "...achieving at least 80% of all sites"? Language should be clearer, i.e. "Compliance during this permit term shall be determined by the presence of an established inspection program designed to inspect all sites and achieving at least 80% of inspections." Is this requirement for the permit term (5 years) or annually?
Shoreline	WWA Phase II	Operations and Maintenance	33	S5.C.7.c - Add a definition in the "Definitions and Acronyms" section for stormwater facility or reference the definition in the SWMMWW.
Shoreline	WWA Phase II	Operations and Maintenance	35	S5.C.7.d - It appears the reference to S5.C.7.c , c, and d should be S5.C.7.a , b, and c
Shoreline	WWA Phase II	Operations and Maintenance	36	S5.C.7.f - Typo - SWPPs should be SWPPPs
Shoreline	WWA Phase II	Source Control Program (WWA)	39	S5.C.8.b.iv(a) - Add a comma after "action(s)". Include email as a follow-up action option.
Shoreline	WWA Phase II	Source Control Program (WWA)	39	S5.C.8.b.iv(b) - It should say "...municipal code or ordinances "instead of "municipal code and ordinances"?"
Shoreline	WWA Phase II	Source Control Program (WWA)	39	S5.C.8.b.iv(d) - How does a Permittee refer a violation to Ecology? Need guidance or language added to include the process.
Shoreline	WWA Phase II	Source Control Program (WWA)	39	S5.C.8.b.v - As this is a new Permit requirement, Ecology should provide specific training to Permittees so that Permittees can then train appropriate business or property management staff. Also, as this a new Permit requirement, there should be a timeline for an initial training.
Shoreline	WWA Phase II	Monitoring and Assessment	48	S8.A.1 - Add the word "payment" in front of the word "amounts" in last sentence to keep consistent with S8.B.1.
Shoreline	WWA Phase II	Monitoring and Assessment	48	S8.B.1 - Typo - "Permittees that chose S8.C Effectiveness Studies Option #1 in in the Phase II..."

Shoreline	WWA Phase II	Monitoring and Assessment	48-49	S8.B.2 - Add a "c" option that is a hybrid similar to the Phase I permit, where you can pay a smaller portion into the regional effort and also conduct local receiving water monitoring to measure the effectiveness of SWMP implementation and LID requirements.
Shoreline	WWA Phase II	Monitoring and Assessment	49	S8.B.3 - Need to have a formal data request mechanism. Recommend incorporating responses as part of the annual report by having an annual report question and add language to S8.B.3 about when Permittees will be notified of the request. For example, Permittees will be notified of all requests annually by August 1st and shall submit their response with their annual report. The annual report question would ask if the Permittee submitted their records per the request and if they choose "no", then they need to explain why they didn't. There should be an N/A option in case there wasn't a request for that reporting year.
Shoreline	WWA Phase II	Monitoring and Assessment	49	S8.C - Change to "Stormwater discharge and local receiving water monitoring"
Shoreline	WWA Phase II	Monitoring and Assessment	49	S8.C.1 - Have a standard Ecology approved or created QAPP for local receiving water monitoring that all jurisdictions would be required to use if they choose this option.
Shoreline	WWA Phase II	Reporting Requirements	50	S9.A - The reporting year should be updated to 2021 to give Permittees to implement the new Permit requirements as was the case in the 2013-2018 Municipal Permit. For instance, it will take time to implement the new IDDE tracking requirements and cannot be expected to be implemented 1 month after the Permit is issued.
Shoreline	WWA Phase II	Appendix 3		Each report question should reference a specific section in the Permit. Questions 29, 30, & 36 do not reference a permit section.
Shoreline	WWA Phase II	Appendix 3	7	Questions 66 & 68 should be swapped so that the questions are in order of the permit sections.